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Mr. Douglas A. Parrott
U.S. Department of Education
111 N. Canal Street, Room 830
Chicago, IL 60606

Dear Mr. Parrott:

One of the most serious potential violations of the Jeanne Clery Act's campus crime reporting requirements that we have ever seen was recently brought to our attention at Notre Dame College in South Euclid, Ohio. According to an article in *Cleveland Scene* (Exhibit A) two incidents of forcible sex offenses allegedly by the same suspect, an acquaintance of each victim, were reported to the Dean of Students last fall who took no steps to warn other students or fully coordinate with other school officials. One victim did wish their complaint to be kept confidential but a general warning could have still been issued about the threat of acquaintance sexual assault.

When the two reports were eventually shared with campus police for the purposes of including them in the annual Clery Act statistics they opened an investigation. Subsequently a belated warning was issued to students, at the very end of the fall semester. Although it did not name the suspect four additional complaints against him were brought forward as a result. Last week this suspect was indicted on a total of 21 counts stemming from all these complaints including rape (Exhibit B).

Research on the "Undetected Rapist" (Exhibit C) indicates that the perpetrators of acquaintance sexual assaults are just as predatory if not more so than their stranger counterparts. This case bears that out and demonstrates that acquaintance sexual assaults may pose an ongoing threat. If the College had, as required by the Clery Act for ongoing threats, issued warnings in these cases it is likely that one or more of the other assaults wouldn't have happened.

The Dean, who resigned earlier this year, was indicted for failing to report these offenses to the police. Clery Act compliance, however, is an institutional responsibility and had proper policies been in place to coordinate reporting for Clery Act purposes it is possible that all of this could have been prevented. Please take prompt steps to determine how this happened, make sure any deficiencies are corrected, and if warranted impose a civil penalty.

Thank you in advance for your assistance. If you have any questions please let us know.

Sincerely,

S. Daniel Carter

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